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Eric Blischke
Oregon Department of Environmental Quality
Northwest Region
2020 SW Fourth Avenue, Suite 400
Portland, OR 97201-4987

Dear Mr. Blischke,

This letter provides the comments of NOAA on three draft DEQ decision memos. The memos present DEQ's determination that sites along the Willamette River do not appear to be current sources of sediment contamination. The memos cover the following three sites:

Front Avenue LP Site – 5480 NW Front Avenue
Schnitzer Kittridge Site – 4959 N.W. Front Avenue
Georgia Pacific Site – 12222 N.W. Marina Way

Unfortunately, the strategy recommendations and the draft DEQ decision memos raised more questions in our minds than they answered. These questions and our recommendations follow.

Front Avenue LP Site

The Front Avenue LP site includes three active businesses – Tube Forgings of America (TFA), CMI Northwest / Hampton Lumber, and Lonestar Northwest, Inc. There is a narrow strip of undeveloped land between the LP site and the Willamette. Most of the data available is from the TFA portion of the site; no sampling data for CMI Northwest or Lonestar is included in the package, but there was some information provided about the history and current activities of these facilities.

TFA is accused of "poor housekeeping." DEQ investigators noted in the early 1990s piles of metal shavings and broken batteries on the ground, and significant amounts of liquid and hazardous wastes have been removed from the property. Three USTs have been removed. At least two of them were leaking, prompting extensive soil removals. From what we can discern from the documents provided by DEQ, visibly stained soils were removed from the site, and not much else was done to address releases at the site.

DEQ's draft conclusion is the site does not likely pose a risk to the river, because areas of stained soils have been cleaned up and contaminants on site did not show up in the EPA sediment sample located near the facility's storm drain outfall. We disagree, and feel that there is insufficient data to arrive at this conclusion.

There is a huge data gap here – groundwater. From what we can tell, there has been only one groundwater sample taken from the site. This sample was collected in 1989

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following the leaking Bunker C fuel tank. The sample contained VOCs and one phthalate, not TPH compounds as expected. However, (1) it was only one sample and (2) the depth of the sample is not given in the report, so the sample may not have been taken at the right depth to find TPH. Earlier investigations discovered concentrations of TPH that suggest free product. It is unclear how much soil was removed, or to what depth. Depth to groundwater is also not provided.

Before discounting this site, we strongly recommend that groundwater samples be taken from several locations at the site. Because of the possible presence of DNAPL originating from the free product, the wells should be screened at several depths, including the bottom of the shallow aquifer. Samples should be analyzed for TPH, PAHs, SVOCs and metals. We also feel that the former impoundment area at Lonestar should also be characterized, particularly if there is a connection between the impoundment and groundwater.

DEQ is relying too heavily on the one EPA sediment sample collected near the facility outfall. This is a dangerous practice for several reasons. First, it is only one sample. That area may have low TOC, generally strong currents, or other factors that would discourage the build-up of contamination in the sediments near the storm drain. Contaminants released from the site storm drain may settle out further downstream in a quieter, finer-grained environment. Second, DEQ is assuming that contaminants are only leaving the site through the storm drain. If the groundwater has been impacted, contaminants may be leaving the facility all along the edge of the site. Contaminants dissolved in groundwater or sorbed to suspended particles would not be expected to settle out immediately adjacent to the facility.

Georgia Pacific Site

This site was used historically for wood treating, a sawmill, and a chip transfer facility and is currently used as a sand and gravel facility.

We agree with DEQ's determination that neither the GP operations nor the current sand and gravel facility are ^{likely sources} ~~probably not a significant source~~ of the PAH contamination observed offshore. We also agree that additional investigation is needed at the historic wood treating facility, and suggest soil and groundwater sampling for creosote, PCP, and metals. We have yet to see a wood treating facility that has not contaminated the soil beneath it.

NOAA is building an electronic database of sediment chemistry and bioassay data for the Portland Harbor site. We would appreciate an electronic copy of the sediment chemistry and a copy of the data report.

Schnitzer Kittridge Site

This site housed an acetylene plant, industrial gas facility and scrap metal recycling facility before being turned into a light industrial park in 1996. We found these documents somewhat difficult to review because they do not describe the closure

activities that took place prior to the development of the industrial park. Were the lime ponds simply paved over? In 1996?

We agree with DEQ's overall conclusion that additional sampling needs to be done to characterize the hazardous substance releases at this site, particularly in the lime pond and the TPH contaminated areas. We agree that metals in groundwater are unlikely to pose a threat to the river, because of the low concentrations and distance to the river.

We suggest that the storm drains themselves be sampled. Since most of the site is paved, it is unlikely that hazardous substances are currently moving from the site out through the storm drains. However, there may be significant amounts of metals and other contaminants residing the storm drain sediments that pose an ongoing risk to the river. The pH of the stormwater indicated some interaction with the lime ponds, so the pH of the sediments in the storm drains should be tested as well.

Thank you for the opportunity to review DEQ's draft decision memos. I hope our comments are helpful. If you have any questions or wish to discuss NOAA's comments, please call me at 206-553-2101.

Sincerely,

Helen Hillman
Coastal Resource Coordinator

cc: Alyce Fritz, NOAA / NOS / CPRD (file copy)
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